

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0000

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JOE ALEXANDROVICH
(OCA/USPS-T5-30-35)
September 11, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE
Director
Office of the Consumer Advocate



KENNETH E. RICHARDSON
Attorney

OCA/USPS-T5-30. If the mail processing variability estimates for MODS, non-MODS offices, or BMCs were to be modified, please identify all portions of your workpapers which would have to be modified.

OCA/USPS-T5-31. Suppose that technical corrections were made to several of the variability estimates provided to witness Degen, and the costs of library reference H-146 had to be revised. Please indicate all inputs that you receive from witness Degen that would be affected by such a change.

OCA/USPS-T5-32. Please identify all inputs to your workpapers that you received from witness Degen's costing testimony and programs. For each of these inputs, please provide citations to the portions of your workpapers, testimony, and library references where they are used.

OCA/USPS-T5-33. Please refer to Attachment 1 to OCA/USPS-T5-11-13. This attachment shows the year end number of clerks, mailhandlers, supervisors, postmasters, and total employee complement by CAG for each of the past five years.

- a. Please provide definitions of CAGs M-Y for FY 1992 and FY 1993.
- b. Please explain why CAGs M and O-Y disappear after FY 1993 and what became of the employees associated with those CAGs after FY 1993.
- c. Please explain why the total complement for the lowest CAG group (N) in FY 1994 drops sharply from the lowest CAG group (M-Y) in FY 1993.

- d. Please explain how the CAG M and CAG O-Y employees in FY 1993 are reflected in the FY 1994-1996 tables of employee complements.
- e. Are all CAG K clerk salaries included in cost segment 4? If not, please explain and provide the proportion of CAG K clerk salaries included in cost segment 4.
- f. Please explain what cost segment includes the CAG L clerk costs.
- g. Please list all crafts or other categories of employees that comprise the FY 1992 and 1993 CAG M-Y "TOTAL USPS" employee counts.
- h. Please list all crafts or other categories of employees that comprise the FY 1994-96 CAG N "TOTAL USPS" employee counts.
- i. Please explain why there are CAG N supervisors only for two years, FY 1994 and FY 1995.

OCA/USPS-T5-34. Please refer to library reference H-1, Table A-1.

- a. Please break down the numbers appearing in the "TOTAL" row by CAG. If this breakdown is not available, please explain.
- b. For each accrued cost in Table A-1, please provide a breakdown by CAG. If this breakdown is not available, please explain. Please provide this information as an Excel spreadsheet file.

OCA/USPS-T5-35. Please refer to library reference H-1, Table A-2.

- a. Please break down each "SEGMENT TOTAL" by CAG. If this breakdown is not available, please explain.

- b. For each number appearing in the column "Accrued Costs," please provide a breakdown by CAG. If this breakdown is not available, please explain. Please provide this information as an Excel spreadsheet file.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
September 11, 1997